

# Exhibit D

1 UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF NEW YORK  
3 Civil Action No. 23-cv-4570-HG

4 ADAM MIZRAHI,

5 Plaintiff,

6 v.

7 EQUIFAX INFORMATION SOLUTIONS,  
8 et al.; EXPERIAN INFORMATION  
9 SOLUTIONS, INC.; VERIZON  
10 WIRELESS SERVICES, LLC,

11 Defendants.  
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22 REMOTE STATEMENT ON THE RECORD

23 DATE: January 30, 2024

24 REPORTED BY: MICHAEL FRIEDMAN, CCR

25 ESQUIRE DEPOSITION SOLUTIONS, LLC  
1384 Broadway - 22nd Floor  
New York, New York 10018  
(212) 687-2010

JOB # J 10784451

STATEMENT ON THE RECORD  
ADAM MIZRAHI vs EQUIFAX

January 30, 2024

TRANSCRIPT of the STATEMENT ON THE  
RECORD, taken by and before MICHAEL FRIEDMAN, a  
Notary Public and Certified Court Reporter of the  
State of New Jersey, via video teleconference, by  
Zoom, on January 30, 2024, commencing at  
approximately 10:30 in the morning.

STATEMENT ON THE RECORD  
ADAM MIZRAHI vs EQUIFAX

January 30, 2024

A P P E A R A N C E S :

STEIN SAKS, PLLC  
One University Plaza  
Suite 620  
Hackensack, New Jersey 07601  
BY: TAMIR SALAND, ESQ.  
NOT PRESENT  
Attorneys for Plaintiff

JONES DAY, LLC  
250 Vesey Street  
New York, New York 10281  
BY: MICHAEL PASLAVSKY, ESQ.  
Attorneys for Experian Information Solutions, Inc.

CLARK HILL, PLC  
210 Carnegie Center  
Suite 102  
Princeton, New Jersey 08540  
(609) 785-2999  
BY: BORIS BROWNSTEIN, ESQ.  
NOT PRESENT  
Attorneys for Equifax Information Services, LLC

Also Present: ANNA SAUNDERS, Videographer  
(Statement on Record was NOT  
Videotaped)

STATEMENT ON THE RECORD  
ADAM MIZRAHI vs EQUIFAX

January 30, 2024

1 CERTIFIED SHORTHAND REPORTER: My  
2 name is Michael Friedman, a Certified  
3 Shorthand Reporter and Notary Public of  
4 the State of New Jersey. This  
5 deposition is being held via  
6 videoconference equipment.

7 The witness and reporter are not in  
8 the same room. The witness will be  
9 sworn in remotely, pursuant to agreement  
10 of all parties. The parties stipulate  
11 that the testimony is being given as if  
12 the witness was sworn in person.

STATEMENT ON THE RECORD  
ADAM MIZRAHI vs EQUIFAX

January 30, 2024

1 MR. PASLAVSKY: Good morning.  
2 Experian served Landstone Equities LLC  
3 with a third-party subpoena for  
4 testimony and documents on January 17,  
5 2024.

6 The subpoena noticed Landstone's  
7 deposition for today, January 30, 2024  
8 at 10:00 a.m. Eastern time.

9 Counsel for Experian e-mailed  
10 Landstone yesterday to remind it of the  
11 deposition scheduled for today.

12 Landstone did not appear for its  
13 deposition this morning. Counsel for  
14 Experian e-mailed Landstone again at  
15 approximately 10:15 a.m. Eastern time to  
16 inquire whether it could be attending  
17 the deposition, but it received no  
18 response.

19 The time is now 10:30 a.m. Eastern  
20 time. Experian will try to reschedule  
21 Landstone's deposition or else Experian  
22 moves to compel Landstone's deposition  
23 before a court in the appropriate  
24 jurisdiction. This deposition will  
25 resume.

STATEMENT ON THE RECORD  
ADAM MIZRAHI vs EQUIFAX

January 30, 2024

1 Mike, we'd like to file this today,  
2 can I get the transcript today?

3 THE COURT REPORTER: Sure, not a  
4 problem.

5 (Proceeding concluded at 10:31  
6 a.m.)

STATEMENT ON THE RECORD  
ADAM MIZRAHI vs EQUIFAX

January 30, 2024

C E R T I F I C A T E

I, MICHAEL FRIEDMAN, a Certified Court Reporter of the State of New Jersey, certify that the foregoing is a true and accurate transcript of the proceedings in the above-entitled matter at the time and place aforesaid.



MICHAEL FRIEDMAN

License No: 30XI0022800

Dated: January 30, 2024